

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

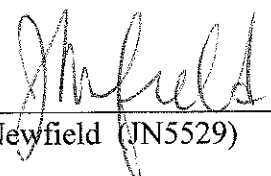
-----X		
MICHAEL CACOPERDO,	:	10 CV 7847 (RPP)(RLE)
	:	
Plaintiff,	:	
	:	
- vs. -	:	DECLARATION OF
	:	<u>JASON NEWFIELD</u>
HARTFORD LIFE INSURANCE COMPANY,	:	
	:	
Defendants.	:	
-----X		

Pursuant to 28 U.S.C. § 1746, Jason Newfield states as follows:

1. I am a Partner with Frankel & Newfield, P.C. and I am counsel of record for the Plaintiff, Michael Cacoperdo in this matter.
2. This declaration is respectfully submitted in support of a joint application for an extension of the end date for discovery, currently set for February 3, 2012, to be extended for forty-five (45) additional days. Counsel for Defendant joins in this application.
3. An amended Scheduling Order was entered on November 9, 2011, setting forth dates for all remaining activities, including discovery and the filing of dispositive motions.
4. The parties have been engaging in discovery, and have been working together to resolve various disputes concerning the nature and scope of discovery. In addition, one deposition has been held, and at least one more deposition is in the process of being scheduled, for an out of state witness.
5. Accordingly, in order to resolve the remaining discovery disputes and complete the remaining discovery, additional time is needed.
6. Defendant has requested that the date for filing dispositive motions also be extended by the Court, by an additional forty-five (45) days.
7. Accordingly, good cause exists to support the application for an additional forty-five (45) days to complete discovery.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 20, 2012
Garden City, New York



Jason Newfield (JN5529)